DOE F 13258
(4/93)

United States Government

Department of Energy
Oak Ridge Operations Office

memorandum

DATE: February 7, 2001

REPLY TO
ATTN OF: UE-54:Rafferty

SUBJECT: REQUEST FOR REVIEW OF DEPARTMENT OF ENERGY ORDER 435.1 EXEMPTION *It"* REQUEST FOR DISPOSAL OF MIXED LOW-LEVEL WASTE AT ENVIROCARE OF UTAH

i i

TO: Andrew Wallo, Director, Air, Water and Radiation Division, EH-412

Attached for your review is an exemption request for use of a commercial mixed low level waste disposal facility for waste from the Portsmouth Gaseous Diffusion Plant (PORTS). This exemption was approved by Rodney R. Nelson, Assistant Manager for Environmental Management for the Oak Ridge Operations Office. In accordance with the provisions of Department of Energy (DOE) Order 435.1, we are transmitting this exemption for a 15-day review period by your office. Per the DOE Order 435.1 guidance, if we do not receive comments regarding environmental concerns from your office within 15 working days, the exemption will be implemented. If environmental concerns are raised we will work with your office to

If you have any questions, please contact Melda Rafferty of my staff at (740) 897-5521

Sharon J. Robinson
Site Manager
Portsmouth Site Office

Attachment

cc w/attachrnent:
E. Regnier, EH-412, HQ/FORS
Melda Rafferty, UE-54/PORTS

DOE I': 13258
(4193)

United States Government

Department of Energy
Oak Ridge Operations Office

memorandum

DATE: February 7,2001

REPLY TO
A TTN OF: UE-54: Rafferty

SUBJECT: **EXEMPTION TO DOE ORDER 435.1**

TO: Rodney R. Nelson, Assistant Manager for Environmental Management, *EM-9010RO*

The DOE Site Office at the Portsmouth Gaseous Diffusion Plant (PORTS) requests your approval to utilize the exemption to DOE Order 435.1 to allow disposal of mixed low level radioactive waste at Envirocare of Utah, Inc. The wastes to be disposed have the following identification numbers:

Waste Stream Description	Waste Type
WO24 Floor Sweepings, Vacuum Dust; Solid Clean-up & Spill Residue .	RCRA /TSCA LLW Debris
WO32 Paint Sludge & Solids; Solid & Liquid Clean-up Debris	RCRA /TSCA LLW Debris
WO52 Solid & Liquids Clean.;up and Spill Residue	RCRA /TSCA LLW Debris
WOO3 Glass Media; Metal,Pleces & Shavings	RCRA LLW Debris
WO26 Metal Pieces & Shavings	RCRA LLW Debris
WO30 Off-Speclfication lab Chemicals	RCRA rrscA LLW Debris
WO31 Off-Specification Lab Chemicals	RCRA LLW Debris
WO58 Carbon Sludge	RCRA LLW Slu,dge/Debrls
WO59 Bag Filters	RCRA LLW Debris
WO15 Heavy Metal Sludge	RCRA LLW Soil/Sludge
P-101 Debris	TSCA LL W Debris
P-450 Floor Sweepings	TSCA LLW Soil
X~701 C Neutralization Pit Remediation Waste	

The items below address the requirements necessary to qualify for the exemption, and supporting documentation is enclosed:

Envirocare of Utah, Inc. meets all applicable Federal, State and local requirements. Their radioactive material license and Part B Pennit are current and approved for mixed low-level radioactive waste disposal. A copy of both the license and pennit are on file at PORTS. The last audit by DOE was perfonned on Envirocare of Utah, Inc. on February 2,2000. A copy of the audit report is enclosed. (Attachment A)

The first ten waste streams identified above total approximately 26,600 cubic feet and will require treatment to meet both Land Disposal Restrictions (LDR) and the waste acceptance criteria of Envirocare of Utah, Inc. All of these waste streams except WO03, W015, and W026 contain listed hazardous waste; meaning that, after treatment, th,is waste will still be regulated as mixed listed waste. Treated listed waste cannot meet the waste acceptance criteria for disposal at either the Hanford Reservation or the Nevada Test Site, since from a regulatory standpoint it is still listed hazardous waste.

The remaining three characteristically hazardous waste streams, which are all metals contaminated, will be treated under the ORO Broad Spectrum Contract. A part of this contract is to perform post treatment analysis to meet Envirocare of Utah, Inc. waste acceptance criteria and provide transportation to their site for disposal.

The next two waste streams (P-l 01 and P-450) total approximately 64,000 cubic feet and meet the waste acceptance criteria of Envirocare of Utah, Inc. These two waste streams were approved by Region V of the United States Environmental Protection Agency as TSCA Remediation Waste
and cannot be accepted for disposal at either the Hanford Reservation or the Nevada Test Site due to the TSCA remediation waste classification. This waste was generated as part of a legal ugreement between the Department of Energy and the U. S. Environmental Protection Agency (EPA), related to containment of polychlorinated biphenyl materials in uranium enrichment buildings' motor housings and ventilation system gasket materials.

This waste could potentially be sent to the DOE TSCA Incinerator, in Oak Ridge, Tennessee, but at much greater total cost. The State of Tennessee has expressed strong reservations regarding acceptance of "out-of-state" waste materials. To date, Portsmouth has been unsuccessful in shipping solid mixed waste to the TSCA Incinerator. However, even if Tennessee authorized this waste to be treated at the TSCA Incinerator, the waste would have to be shipped to the facility, sorted to remove non-incinerable waste, and placed into incinerable containers (fiberboard). The waste would then be incinerated, but the resultant ash must then be stabilized and shipped to Envirocare of Utah, Inc. for disposal. A rough estimate for this activity is about six million dollars.

This method would leave the drums the waste was originally stored in to be either crushed and disposed directly at Envirocare of Utah, Inc. or decontaminated (for both the TSCA and radiological components).

If the crushed drums and sorted non-incinerable debris were shipped to Envirocare of Utah, Inc. as TSCA LL W , a rough estimate for crushing and disposing the remaining waste and drums is about 2 million dollars (approximately $200 per drum).

Decontamination and crushing of the empty drums and non-incinerable debris would be extremely cost prohibitive, given that for decontamination of each drum, Portsmouth would generate approximately fifteen gallons ofkerosene, which would then have to be treated and disposed. Additionally, generation of this quantity of waste kerosene (approximately 117,000 gallons) would not provide a good example of waste minimization and pollution prevention practices. A rotlgh estimate for decontamination, crushing and disposing of the remaining waste and drums is about 6.5 million dollars (approximately $830 per drum).

The last waste stream (X- 701C Neutralization Pit Remediation Waste) consists of approximately 22,000 cubic feet will be mixed RCRA-LLW. This waste will be listed hazardous waste and cannot meet the waste acceptance criteria for disposed at either the Hanford Reservation or the Nevada Test Site due to its listed status.

All of the waste streams have been characterized and detennined to be mixed (RCRA and/or TSCA),low level radioactive waste in accordance with the Bechtel Jacobs Company LLC Portsmouth waste characterization program.

Portsmouth does not have an on-site disposal facility , and is not an authorized shipper to the Nevada Test Site. Although Portsmouth is an authorized shipper to the Hanford Reservation for disposal of low level radioactive waste, this authorization excludes mixed low level radioactive waste. Disposal and transportation estimates are shown below:
Disposal at Envirocare $5,570,000
Transportation to Envirocare $1,220,000

A NEPA review on each waste stream concluded that the work is covered under Categorical Exclusion for Maintenance Activities (CX-GEN-Ol1). The documentation is attached. (Attachment B)

Portsmouth will utilize the Oak Ridge mixed waste disposal contract for disposal of the mixed low level radioactive waste at Envirocare of Utah, Inc. (ContractNo. DE-AM24-98OH20053).

The State of Utah Department of Environmental Quality (DEQ) representative, Mr. Sinclair, and the Northwest Compact representative, Mr. Garner, have been consulted regarding the above shipments. A copy of the electronic mail correspondence documenting the conversations is attached. (Attachment C).

ATTACHMENT A

For questions, please contact Melda Rafferty of my staff at (740) 897-5521.

Sharon J. Robinson

Site Manager
Portsmouth Site Office

Attachments
cc w/attachments
Andrew Wallo, III, EH-41/FORS
Mark W. Frei, EM-30/FORS
Martha Ki-ebs, SC-I/FORS
Melda Rafferty, UE-54/PORTS
Jim King, BJC/PORTS
APproval~ Rodney R. Nelson

6498 0000 86

BECHTEL
JACOBS

Interoffice Memorandum

ro M. L. Allen, P. F. Clay, G. R. Eidam, C. E. Frye, R. D. George, S. M. Houser, J. E. King, J. C. Massey, A. K. Phelps

File No LW-OO-0394

Dare **March 21.** 2000

Subjecr Facility Approval for Envirocare of Utah

M. L. West

Of Legacy Waste Project

576-i733

Ar K-1320

Copies To Distribution

A Department of Energy (DOE) Oak Ridge Operations audit of Envirocare of Utah (Envirocare). Clive. Utah. was completed on February 2. 2000. Based upon the DOE audit package. the use of Envirocare for the storage. treatment. and disposal of hazardous. mixed. and low-level waste meeting tile Envirocare 'waste acceptance criteria is approved. 111is approval is also based on a history of annual DOE evaluations and This approval expires February 2, 2001.

If you have questions regarding this approval, please contact Jim Bailey at 576-4489.

T. P. A. Perry

M. L. West :vIILtrG;

TPP:aaw

Attachment: Audit of Envirocare of Utah Facility by the Department of Energy Oak Ridge Operations

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ATTACHMENT

Audit of Envirocare of Utah by the Department of Energy
Oak Ridge Operations

Reference: ~nteroffice Memorandum dated March 21.2000; subject. "Facility Approval for Envirocare of Utah"

DEPARTMENT OF ENERGY
OFFICE OF ENVIRONMENTAL MANAGEMENT
OAK RIDGE OPERATIONS
AND
OHIO FIELD OFFICE

JOINT AUDIT OF THE OFF-SITE TREATMENT
STORAGE/DISPOSAL FACILITY
ENVIROCARE OF UTAH, INC.
CLIVE, UT AH

JANUARY 31-FEBRUARY 2,2000

AUDIT REPORT

Department of Energy
Office of Environmental Management
Oak Ridge Operations Office and Ohio Field Office

Joint Audit of the Off-Site Treatment/Storage/Disposal Facility
Envirocare of Utah, Inc.
Clive, Utah

1.0 OBJECTIVE

An audit of Envirocare of Utah, Inc. (EC), was conducted January 31- February 2, 2000, by the Department of Energy (DOE), Oak Ridge Operations (ORO), Office of Environmental Management. Management systems and operational activities were assessed at the EC facility in Clive, Utah. The objective of this audit was to verify that the EC facility can meet the requirements of DOE as specified in Contract E-RPO5-93022074, Contract DE-AM24- 98qH20053 and meet the requirements of the October 24,1996 Memorandum from Al Alm to DOE Managers, "Delegation of Authority to Grant Exemptions to Department of Energy Order 5820.2A to Allow for the Use of Commercial Facilities for Disposal of Department of Energy Low-Level Wastes".

2.0 SCOPE AND LOGISTICS

The audit was led by the DOE ORO Environmental Management, Waste Management and Technical Integration Team. The audit team included a DOE ORO lead auditor, DOE staff, and representatives from DOE prime contractors. Their names, affiliations, and areas of review during the audit included:

David Carden, DOE ORO: Audit Team Leader; Radiological Control, and Data Quality Control
Tom Jeskie, Parallax, Inc.: Compliance, Waste Management, and Safety and Health
Chip Davis, Parallax, Inc.: Quality Assurance Management Systems
Bob Danner, DOE Fernald: Waste Operations
Don Pfister, DOE Fernald: Railway Operations
Sarah Alkire, Batelle Columbus: Compliance, Waste Management, and Safety and Health

The audit was conducted at the EC facility in Clive, Utah. A kickoff briefing was held January 31 to acquaint the team with EC organizational counterparts and to coordinate the activities of the

audit. During the audit, an audit closeout was held on February 1, when findings were provided to EC management.

Key EC Personnel who were contacted included

Tye Rogers Guy	**Chris Lee** Jeff Gardener **Jennifer**	Jeremy Hodges Bob
Richards Kirk	**Warr Jesse Garcia** , **Shane Lowry**	Reifsn)"der Kelly
Curtis Dave Moir	**Pete Wick Damon** Young **Marci**	Reudter Cflris Lee
Kelli Epperson	**Wicks Shane Johannsen Dave**	Rex Leach
	Tolbert	

3.0 RESULTS

3.1 Proficiencies

(I) EC management and staff were helpful in providing all information and documentation requested by the auditors. The staff demonstrated a good understanding of their assigned tasks and were receptive to auditor comments .on areas for improvement.

(2) The conduct of operations at the EC facility is very good and reflects the formality and professionalism demanded for nuclear facility management. All key operations are proceduralized and is evident that the workers are trained to and conduct their work in accordance with these Standard Operating Procedures (SOPs). Log keeping practices are consistent and well implemented.

(3) The radiation protection program at the EC facility is well implemented and thorough, With only a few exceptions1 radiation protection program activities are well proceduralized and documented.

(4) The EC radiological laboratory has shown noteworthy improvements within a growing operation. An example of such is how this laboratory utilizes the surveillance program to analyze events to determine cause and corrective actions to mitigate future occurrence.

(5) Housekeeping, quality control, and log keeping in the fingerprinting laboratory remain excellent. The section of the EC facility has repeatedly shown to be well managed over the numerous audits conducted in recent years.

3.2 Findings

3.2.1 Radiological Controls/License ComRliance

3.2.1.1 **Status of Previous Radiological Control/license Findings**

HP-951019-D: Radiological data generated in-house and from commercial laboratories do not go through a formal verification and \'alidation process. (Priorit)' II) (NQA-1, Sections 9 and 14) *(OPEN)*

Discussion'

This finding is partially closed. A process is in place to verif)' and validate data from the in house radiological laboratory .This process includes:

Verification by gamma spectroscopy analyses by splitting 5% of in-house samples with a commercial laboratory. The results of these splits must agree ~.i[hin two standard deviations,

Participation in the DOE Environmental Measurements Laboratory Quality Assurance Program.

(2)

Ho\vever, Envirocare still has not implemented a program for validation of data received from their commercial analytical laboratory for radiochemical analyses.

Envirocare believed that this finding was closed since in their DOE approved March 18, 1999 corrective action response to this finding stated that "al1radiological data is reviewed by the Corporate RSO for consistency". However, there is no formality to the RSO review whether it is for quality or consistency.

It is recommended that a formal data review and validation program be implemented as is being done for the nonradiological data generated by commerc.iallaboratories for Envirocare.

HP-960717-A: Correction factors for radiological measurements of "smears," "swipes," and air samples are not incorporated into radiological measurements as indicated by natio.nal standards. (Priority II)(NCRP 50 Environmental Measurement and NCRP 58 Radioactivity Measurement SOPs) *(CLOSED)*

Discussion

For air filters (lapel monitors, hi-vol samplers), the alpha and beta counting efficiency is now based on a standard that has a filter paper matrix. This has dramatically reduced the counting efficiency from near 30% to around 16%. The counting efficiency for smear samples remains

based on a plated source, but EC staff have conducted sufficient and documented evaluation of this to detennine that it is adequate. This finding is verified as being closed.

RC-970S08-A: EC has not established a SOP for volumetric release of materials from restricted areas of the facility. (Priorit}' II)(10 CFR Part *20)(tLOSED)*

Discussion:

EC has developed and implemented EC SOP RC-1.9, .,"Volumetric MaIeriaI Release" March 17, 1999 That SOP was reviewed and found to be sufficient to meet the requirements of 10 CFR Part 20. This finding is verified as being closed.

RC-980430-A: There is no defined protocol for evaluation of EC-generated radiological data to ensure that waste manifests accurately reflect customer waste shipments. (Priority II) (NQA-l) *(CLOSED)*

Discussion:

EC has developed and implemented EC SOP RC-6.3, ."Radiological Re\"iew oflncoming Waste Streams" March 11, 1999 That SOP was reviewed and found to be sufficient to meet the concerns expressed in the audit report. The SOP ensures that a sample is collected of incoming waste streams and is analyzed by gamma spectroscopy. The sample data is compared with the waste profile to ensure that it does not contain radionuclides that were not specified in the waste profile. The SOP also provides direction in the event that discrepancies are identified including initiating surveillances and problem reports for resolution.

The SOP indicates improvement in the area of data verification and validation for in-house data. The SOP explains in detail the process for collecting and tracking samples, both pre- and post- shipment. Field assessments and discussions with personnel indicate that personnel are familiar with the necessary paperwork and steps to be taken to ensure integrity of samples, chain of custody, etc. This finding is verified as being closed.

3.2 .2 New Radiological Control/License Findings

RC-OOO202-A: Action limits and corrective action requirements for gamma exposure rate survey measurements are not defined in SOPs. {Priorit). II)(DOE Order 414.1A)

Discussion:

Interviews with the EC Radiation Safety Officer indic;ated that a dose rate action level of 15 uR/hr is used for routine perimeter dose rate surveys. If this value is exceeded, the source of the elevated exposure is investigated and, if possible, corrective actions are taken. However, this action limit and the need to investigate exceedances of this limit are not specified in the SOP for routine radiation surveys (RS 2.7)

3.2.2 Safe-tY **and Health**

3.2.2.1 Status of Previous Safety and Health Findings

SH-980430-A: The existing EC Resource Conservation and Reco\'ery Act (RCRA) Contingency Plan does not contain all information required for an OSHA emergency response plan. (Priority II) (29 CFR 1910.120(p)(8)(ii)) *(CLOSED)*

Discussion:

A December 7, 1999 of the Contingency Plan has been prepared. This plan has the required components including, (1) list of office phone numbers for the emergency coordinator and ,backups (2) description of arrangements with local police depan:ments, fire departments, hospitals, etc. ..(3) contains a physical description of the emergency equipment. Although this finding is considered closed, verification resulted in the addition of a new finding, SH-OOO202-D

SH-990108-A: The EC laboratory Chemical Hygiene Plan does not reflect current operations. (Priority II)(29 CFR 1910.1450) *(CLOSED)*

Discussion:

EC has revised and implemented a new EC SOP SH 15.0, "Laborator:-. Chemical Hygiene Plan", March 15,1999. This revision goes well beyond the needs of the original finding, which was primarily based on a change of lab location. The new plan has been reviewed and found to be acceptable. This finding is verified as being closed.

3.2.2.2 New Safety and Health Findings

SH:000202-A: The EC MSDS system and chemical inventor)' require additional rigor. (Priority II) (29 CFR Part 1910.1200 &.1450)

Discussion:

A review of the EC MSDS and chemical inventory processes indicated rhe follo\\.ing weaknesses:

(I) NearlJ' all of the MSDS's reviewed were at least 5 years old and probabl:" not current, MSDS ' s that are possibly outdated are not removed from all accessible locations used for reference by employees,

(2) There is no process to ensure that hazardous materials no longer used on-siLe are removed from the inventory; and

(3) The master reference copy ofMSDS's has not been purged ofnon-utilized hazardous substances.

(4)

SH-OOO202-B: The portable emergency eyewash located in the Chemistr)' Laborator)' is not serviceable. (Priority II) (29 CFR Part *1910.151){CLOSED)*

Discussion:

The Chemistry Labor~tory has a standpipe emergency eyewash/safet)' shower connected to the facility water supply, A second emergency eyewash is in place which requires upkeep to maintain a hygienic condition of the water. Upon looking into the eye\\'a.sh reser\'oir, copious bacteriological growth was' observed. The stated purpose of this eyewash is in case of a power failure when the standpipe system would receive no water via an electric pump. In the event ofa power failure, laboratory operations should be ceased, thus no need for this second eyewash, EC should evaluate this situation and remove this eyewash from ser\'ice if indicated,

EC evaluated the above described condition after the closeout meeting and removed this particular eye from service. This finding was then verified and is now considered closed.

SH-000202-C: Gas cylinders Jocated outside of the Radiological Laborato~. are stored improperly. (Priority II) (29CFR Part 1910.101; CGA Pamphlet *PS-6-1999)(CLOSED)*

Discussion:

Compressed gases stored outside the Radiological Laboratory are stored on a straight line array with a single chain. The requirements for safe cylinder storage do not allow a straight line array without chaining each cylinder independently. EC should evaluate the requirements in the above referenced requirements and institute compliant and safe cylinder storage practices throughout the site.

EC evaluated the above described condition after the audit closeout meeting and reinforced the chaining system to adequately secure the cylinders. This finding was then verified and is now considered closed.

SH-OOO202-D: The Site Contingency Plan; as required by RCRA, does not accurately reflect site conditions. (Priority II) (29 CFR 1910.120)

Discussion:

The December 7, 1999 revision of the Site Contingency Plan includes maps of each building tl1at contain the location of exits and emergency response equipment. The location of fire . extinguishers as depicted in the maps in incorrect. Additionally the use of some rooms has changed and the maps have not been updated. For example, rooms in the Admin building which are labeled as labs are now offices.

Waste OQerations

., Status of Previous Waste Operations Findings

None,

3.2.3.2 New Waste Operations Findings

QualitY Control of Environmental and Waste Data

3.2.4 Status of Previous Data *QAlQC* for Sampling and Analysis Programs -Environmental and Waste Data Collection Findings

DO-980430-A: Excess samples that have exceeded archival dates are not consistently dispositioned in a timely manner. (Priority III) *(CLOSED)*

Discussion:

EC has made significant progress towards the disposition of samples that have been sent to offsite laboratories (Mountain State and Barringer). A formal computer tracking system has been implemented that documents when samples are shipped to offsite laboratories, when they are due for return, and the date of their actual return. E-mail messages are sent to the laboratories

notifying them of when samples have exceeded their schedule return date. This finding is verified as being closed.

DQ-990108-A: Gamma counting geometries for air filters are not consistent with the geometry used during instrument calibration. (Priority III) *(CLOSED)*

Discussion:

The plated sources, which were formerly used to calibrate the gas proportional counter, have been replaced with a calibration standard on a paper filter. This provides a closer match to the samples that are analyzed and provides for a correction for self absorption by the paper filter matrix. This finding is verified as being closed.

3.2.4.2 New Environmental and Waste Data Collection Findings

None

Environmental Compliance/Permitting

3.2.5 Status of Previous Environmental Compliance/Permitting Findings

None.

3.2.5.2 New Environmental Compliance/Permitting Findings

None.

Quality Assurance and Management Systems

3.2.6 Review of Previous QA and Management Systems Findings

QA-970508-C: A formal EC training program does not reflect actual practices. (Priority II) (EC QAM, NQA-1)*(CLOSED)*

Discussion:

Reviewed qualification SOP and qualification cards. practices. The current practices used reflect the actual Finding is verified as closed.

3.2.6.2 New QA and Management Syste:ms Findings

OA-OOO202-A: The Shipping and Receiving SOPs do not accurately reflect the forms in use. (Priority II) (DOE Order *414.1A)*

Discussion:

Shipping and receiving department utilizes an *EC-18* "Incoming and Acceptance Record" as part of its shipment acceptance process. This fonn is not referenced in either SHR 4. J or SHR 4.2. An EC-18a is ret-erenced in the SO p and is being used, this is however; not the same as an E C - 18. Additionally rwo versions of the EC-18 are being used. One as an acceptance document and one as a release document. These are totall:. different forms \\"hich carl")' the same designation.

4.0 OBSER\-A TIONS

(I) EC has not instituted a process tor standardizing hazard labeling throughout the site. EC plans to use the NFP A system and is encouraged to complete this standardization.

(2) It is difficult to quantitatively demonstrate that the requirement for QA Officer verification of construction quality control testing is being met. The construction quality assurance plan requires that the QA Officer verify a minimum of 5% of the quality. control tests for cell construction and waste placement. These QC tests included in-place density test, efflux tests for flo\\,able fill, standard proctor tests, field surveys, etc.

The standard certificate is not kept for the 100 pprn isobutylene standard used for calibration of the organic \'apor analyzer used in the sniffer test.

EC's process for tracking and maintaining calibration of equipment is not functioning properly. Not all equipment is identified on monthly reports, and field equipment is out of calibration: There is no clearly defined mechanism for inputting newly purchased equipment into the tracking syste~.

No SOP exists for repackaging field samples into cans in Chemistry Lab.

Laboratory secondaI")' waste receptacles are not clearly segregated or labeled.

The requirements for and tracking of asbestos debris could not be clearly defined and references were not available in the SOPs revie\ved.

ATTACHMENT B

RRPORlO6

NEP A RECORD REPORT

Project Title: **Mixed Low Level** Waste

Work Location: All Operational Facilities at the Portsmouth Gaseous Diffusion Plant

Description: The action would involve routine waste staging operations for shipment of the following mixed low level waste to Envirocare, Utah:

WO24	Floor Sweepipgs
WO3O	Labpacks
WO32	Paint Sludges
WO52	Clean-up and Spill Residue
WOO3	Glass Beads
WO26	M~tal Pieces and Shavings
WO31	Labpacks
WO58	Carbon Sludge
WO59	Bag Filters
WO15	

To: Scott Kelley

From: Rosemary Riclunond

Subject: Shipment and Disposal Operation of Mixed Low Level Waste

Reference: Generic Categorical Exclusion for Maintenance Activities (CX-GEN-Oll) referencing temporary waste holding areas for routine activities. CX - GEN **-0** 11 was approved 10/7/97.

In ~ccordance with the above reference, the work described is categorically excluded from further NEPA review and documentation. Activities would be conducted in previously disturbed areas and would not adversely affect environmentally sensitive resources such as archeological or historical sites, endangered species, critical habitats, floodplains, and wetlands.

Date: *7/~/0 I*

RRPORlO7

NEP A RECORD REPORT

Project Title: TSCA Low Level Waste

Work Location: All Operational Facilities at the Portsmouth Gaseous Diffusion Plant

Description: The action would involve routine waste staging operations for shipment of the following TSCA low level waste to Envirocare, Utah:

P-lOl	Debris
P-450	Floor Sweepings

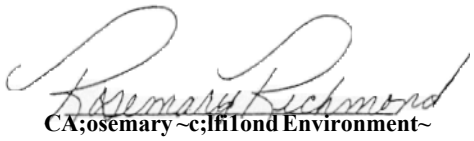
To: Scott Kelley

From: Rosemary Richmond

Subject: Shipment and Disposal Operation ofTSCA Low Level Waste

Reference: Generic Categorical Exclusion for Maintenance Activities (CX-GEN-Oll) referencing temporary waste holding areas for routine activities. CX-GEN-Oll was approved 10/7/97.

In accordance with the above reference, th.e work described is categorically excluded from further NEP A review and documentation. Activities would be conducted in previously disturbed areas and would not adversely affect environmentally sensitive resources such as archeological or historical sites, endangered species, critical habitats, floodplains, and wetlands.



CA;osemary ~c;lfi1ond Environment~ Compliance

j/;:,/0/

Date:

ATTACHMENT C

~'..''---'','',''''; -,r , '

-. 'Kellev~'fP.;ran~S. JM0:3, ' . (i; ''''.-

From: Kelley, Alan S. (YO3)
Sent: Wednesday, December 13,20003:52 PM
To: 'iamg46-1@ecy.wa.gov'
'Cc: Rafferty, M. J. (QP4)'; Wamer, Christopher L. (14E) Subject: Record of Conversation

Mr. **Garner,**

This message is to document our conversation earlier, regarding shipment of low-level radioactive waste (LLW) to Envirocare of Utah. A requirement of DOE Order 435.1 to receive an exemption allowing commercial disposal of LL W is to consult with appropriate compact officials concerning the waste shipments.

Bechtel Jacobs Co. LLC, the DOE contractor for environmental restoration and waste management activities at the Portsmouth Gaseous Diffusion site, is planning to transport the following treatment residues waste to Envirocare during the next year:

Description Waste Type

.Floor Sweepings, Cleanup Residue RCRA/TSCA/LLW
.Paint Sludge Solids, Cleanup/Spill Residue RCRA/TSCA/LLW
.PPE, Solid Cleanup and Spill Residue RCRA/TSCA/LLW
.Glass Media, Metal Shavings RCRNLLW
.Off-Specification Chemicals RCRNTSCA/LLW
.Off-Specification Chemicals RCRNLLW
.Carbon Sludge RCRA/LLW
.Bag Filters RCRA/LLW

These wastes total approximately 26,600 cubic feet prior to treatment.

The following TSCNLLW wastes are planned for shipment to Envirocare for direct disposal during the next year:
.Debris (Pads, PPE, etc)
.Floor Sweepings

These wastes total approximately 64,000 cubic feet.

If you need any additional information, please let me know.

Scott Kelley, REM, RRPT
Materials Disposition Manager

Bechtel Jacobs Go. LLG P.O.
Box 900
Piketon, OH 45661

Phone: (740) 897 -3624 Fax:
(740) 897-2900

Kelley, Alan S. (YO3)

From: Kelley, Alan S. (YO3)
Sent: Wednesday, December 13, 20003:55 PM
To: 'bsinclai@deq,state. ut.us'
Cc: Rafferty, M. J. (QP4) ; Warner, Christopher L (14E)
Subject: Record of Conversation

Mr. Sinclair,

This message is to document our conversation earlier, regarding shipment of low-level radioactive waste (LLW) to Envirocare of Utah. A requirement of DOE Order 435.1 to receive an exemption allowing commercial disposal of LLW is to consult with appropriate state officials concerning the waste shipments.

Bechter Jacobs Co. LLC, the DOE contractor for environmental restoration and waste management activities at the Portsmouth Gaseous Diffusion site, is planning to transport the following treatment residues waste to Envirocare during the next year:

Description Waste Type

.Floor Sweepings, Cleanup Residue RCRAfTSCA/LLW
.Paint Sludge Solids, Cleanup/Spill Residue RCRAfTSCA/LLW
.PPE, Solid Cleanup and Spill Residue RCRAITSCA/LLW
.Glass Media, Metal Shavings RCRA/LLW
.Off-Specification Chemicals RCRAfTSCA/LLW
.Off-Specification Chemicals RCRA/LLW
.Carbon Sludge RCRA/LLW
.Bag Filters RCRA/LLW

These wastes tota1 approximately 26,600 cubic feet prior to treatment

The following TSCA/LLWwastes are planned for shipment to Envirocare for direct disposal during the next year:

.Debris (Pads, PPE, etc)
.Floor Sweepings

These wastes total approximately 64,000 cubic feet.

If you need any additional information, please let me know.

Scott Kelley I REM, RRPT
Materials Disposition

Bechtel Jacobs Go. LLG P.O.
Box 900
Piketon, OH 45661

Phone: (740) 897 -3624
Fax: (740) 897-2900